

DAVID A. DEPOLO, ESQ. (State Bar No. 118205)
AMY K. LEE, ESQ. (State Bar No. 244542)
DONNELLY NELSON DEPOLO & MURRAY LLP
Shadelands Point
2401 Shadelands Drive, Suite 120
Walnut Creek, CA 94598-2428
Tel. No. (925) 287-8181
Fax No. (925) 287-8188

Attorneys for Plaintiff
Marilyn Teakle

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARILYN TEAKLE,

Case No. C07-02973 EDL

Plaintiff,

**PLAINTIFF MARILYN TEAKLE'S INITIAL
DISCLOSURES**

vs.

LAFAYETTE ORINDA PRESBYTERIAN
CHURCH; PRESBYTERY OF SAN
FRANCISCO; THE SYNOD OF THE PACIFIC;
and DOES 1 through 50, inclusive,

[Fed. R. Civ. P. 26]

Defendants.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff Marilyn Teakle submits the following statement of initial disclosures pursuant to Rule 26, subparagraphs (a)(1) and (f) of the Federal Rules of Civil Procedure:

(1) Individuals Likely to Have Discoverable Information – These individuals are familiar with the quality of Ms. Teakle's work.

(a) Sherre Bernardo, 7075 Hearst Drive, El Dorado Hills, CA, (925)899-8081, present at Ms. Teakle's exit interview.

(b) Ruth Stenson, 921 Ulfian Way, Martinez, CA 94553, (925)586-4293, has knowledge of Julie Ford's treatment of Marilyn Teakle.

(c) Donna Perry, 1667 Bivar Court, Pleasanton, CA 94566, (925)398-8681

(d) Jan Browne, 1062 Via Media, Lafayette, CA 94549, (925)284-2786

(e) Verna Broderick, 3666 Nordstrom Lane, Lafayette, CA 94549,

(925)283-8734

(f) Gail Doering, 3441 Solano Court, Lafayette, CA 94594, (925)299-8856

(g) Paul Swatek, 3433 Woodview Drive, Lafayette, CA 94549, (925)283-3635

(h) Janet Russell, P.O. Box 991559, Redding, CA 96099-1659

(i) Kathy Hallock, 326 Norris Canyon Terrace, San Ramon, CA 94583,

(925)939-1849

(j) Karen Lee, 412 Jonathan Ridge Road, Danville, CA 94506

(k) Rita Neill, 510 Buckeye Court, Benicia, CA 94510, (925)360-4819

(l) Paula Weil, 1221 Oakmont Drive, #1, Walnut Creek, CA 94595,

(925)933-3343

(m) Inez Wright, 13 Green Valley Drive, Lafayette, CA 94549,

(925)933-0924

(n) Muriel Fry, 1235 Barott Road, Lafayette, CA 94549, (925)937-4709

(o) Helga Quillen Skaggs (530)623-2499

(2) Documents in Ms. Teakle's Possession

- November 2, 2006 Letter of Recommendation for Marilyn Teakle by Rev. Gail Doering
- Talking Points Memo for Proposed Meeting with Marilyn Teakle
- March 16, 2007 Memorandum by Chuck Fry to Marilyn Teakle
- March 29, 2006 E-Mail Correspondence by Julie Ford to Marilyn Teakle
- February 3, 2006 Compensation Correspondence from Don Beerline to Marilyn Teakle
- February 4, 2005 Compensation Correspondence from Personnel Team to Marilyn Teakle
- February 8, 2004 Compensation Correspondence from Peter Whitelock to Marilyn Teakle
- February 2, 2004 Performance Appraisal from John Nelson to Marilyn Teakle

- 1 • February 18, 2003 Resolution of Appreciation for Marilyn Teakle
- 2 Correspondence by Peter Whitelock and Inez Wright
- 3 • June 8, 2004 Correspondence by Mary Smith to Marilyn Teakle
- 4 • May 27, 1992 Compensation Adjustments Correspondence from Tim McCarthy
- 5 to Wilma Senff
- 6 • September 29, 1981 Correspondence from Linda K. Tomatis to Marilyn Teakle
- 7 • November 1, 2006 Reference Letter from Paul Swatek
- 8 • October 9, 2006 Reference Letter from Rev. Janet A. Russell
- 9 • July 18, 2006 Correspondence from Don Beerline to Marilyn Teakle
- 10 • Lafayette-Orinda Presbyterian Church Personnel Policy Manual
- 11 • 2006 Lafayette-Orinda Presbyterian Church W-2 Wage and Tax Statement
- 12 • 2006 Kelly Services, Inc. W-2 Wage and Tax Statement
- 13 • Lafayette-Orinda Presbyterian Church pay stub nos. 3449, 2386, 2525, 3556,
- 14 3798, 4136, 2730, 1830, 2810
- 15 • December 18, 2002 Performance Appraisal
- 16 • June 17, 1998 Certificate of Completion on Tips, Tricks, Shortcuts Word 97 for
- 17 Win 95
- 18 • June 5, 1998 Certificate of Completion on Beginning Excel 97 for Win 95
- 19 • May 14, 1998 Certificate of Completion on Intermediate Word 97 for Win 95
- 20 • September 12, 1997 CompUsa Certificate of Completion for Access 2.0
- 21 Introduction
- 22 • August 20, 1997 CompUsa Certificate of Completion for Word 97 Intermediate
- 23 • August 18, 1992 Correspondence from Sally Lopez to Marilyn Teakle
- 24 • June 12, 1989 Correspondence from Barbara Abel and Joan Nogueta to Marilyn
- 25 Teakle
- 26 • July 16, 2004 Calendar and Publications Coordinator Job Description
- 27 • March 2, 1999 Annual Salary Review
- 28 • January 29, 1998 Annual Salary Review

- October 21, 1997 Bonus
- July 15, 1997 Retroactive Raise
- February 7, 1996 Correspondence from Rev. William B. Rolland to Marilyn Teakle
- January 24, 1995 Correspondence from Jim Schultz to Marilyn Teakle
- March 1992 Employee Performance Evaluation
- December 1990 Employee Performance Evaluation
- March 30, 1988 Memorandum from Lois Boyd to Wilma Senff
- 1989 Support Staff Performance Evaluation
- 1988 Secretarial Performance Evaluation
- 1984 Support Staff Performance Evaluation
- January 14, 1988 Support Staff Annual Review
- December 9, 1992 Evaluation Summary
- December 1, 1992 Staff Evaluation
- November 28, 1980 Correspondence from Irving R. Seely to Marilyn Teakle
- December 5, 2006 Correspondence from Peter Whitelock to Marilyn Teakle
- November 27, 2006 Correspondence from Marilyn Teakle to Chuck Fry

(3) Computation of Damages

- (a) Base wage loss of approximately \$20,000 to date, and continuing until Ms. Teakle secures comparable replacement employment;
- (b) Front pay compensation of approximately \$150,000 in lieu of reinstatement as Ms Teakle's position has been filled.
- (c) Lost benefits of employment estimated at \$20,000.00 to date, and continuing until Ms. Teakle secures comparable replacement employment;
- (d) Emotional distress damages in an amount to be determined, which are ongoing;

(e) Costs and attorneys' fees, in an amount to be determined following trial, but which will probably exceed \$200,000.

(4) Insurance

Plaintiff is unaware of any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy any judgment in this action.

Dated: 8/31/2007

DONNELLY NELSON DEPOLO & MURRAY

By: 

DAVID A. DEPOLO

Attorneys for Plaintiff
Marilyn Teakle

PROOF OF SERVICE

I declare under penalty of perjury that:

I am a citizen of the United States and am employed in the County of Contra Costa. I am over the age of eighteen years and not a party to the within action. My business address is 2401 Shadelands Drive, Suite 120, Walnut Creek, CA 94598-2428.

On the date set forth below, I caused the attached **PLAINTIFF MARILYN TEAKLE'S INITIAL DISCLOSURES** to be served on the parties to this action as follows:

☐ **BY MAIL.**

I placed a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Walnut Creek, California, addressed to the parties as set forth on the attached service list. C.C.P. §§1013(a), 2015.5.

☐ **BY COURIER SERVICE.**

I retained CCX Couriers, Inc. of Walnut Creek, California, to personally serve a true copy thereof on the parties as set forth on the attached service list. C.C.P. §§1011, 2015.5.

☐ **BY UNITED PARCEL SERVICE.**

I retained UPS to personally serve a true copy thereof on the parties as set forth on the attached service list. C.C.P. §§1013(c), 2015.5.

☒ **BY GOLDEN STATE OVERNIGHT.**

I retained Golden State Overnight to personally serve a true copy thereof on September 4, 2007 on the parties as set forth on the attached service list. C.C.P. §§1013(c), 2015.5.

☐ **BY FACSIMILE TRANSMISSION.**

I am readily familiar with this law firm's business practices for collection and processing of documents by way of facsimile. I telefaxed a true copy thereof at said facsimile number(s) as set forth on the attached service list. C.C.P. §§1013(e), 2015.5 and C.R.C. §2.306.

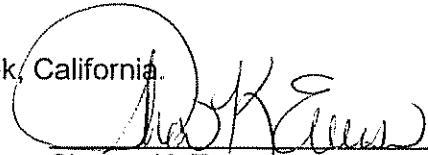
☐ **BY PERSONAL SERVICE.**

I personally served a true copy thereof on the parties as set forth on the attached service list at . C.C.P. §§1101, 2015.5.

1
2 ☒ BY ELECTRONIC SERVICE.

3 At approximately _____ on September 4, 2007, I retained ECF/PACER to
4 electronically serve a true copy thereof on the parties as set forth on the attached
5 service list. C.C.P. §1013(a) and CRC 2.260.

6 Executed on September 4, 2007 at Walnut Creek, California.

7 
8 Sharon K. Everson
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28